

FEDERAL ELECTION COMMISSION Washington, DC 20463

TO:

1 2

3

4 5

6

7 8

9

10

11

12 13

14 15

16 17

18 19

20

21 22

23

24

25

26 27

28 29

30

The Commission

FROM:

Daniel A. Petalas

Associate General Counsel for Enforcement

Kathleen Guith

Deputy Associate General Counsel

BY:

William Powers

Assistant General Couns

Peter Reynolds Phank

Attorney

SUBJECT:

MUR 6919 (Jorge Canseco, Inmuebles Caza, S.A. de C.V.)

Pre-Probable Cause Conciliation

I. **INTRODUCTION**

On March 3, 2015, the Commission found reason to believe that Jorge Canseco and Inmuebles Caza, S.A. de C.V. ("Respondents") violated 52 U.S.C. § 30121 (formerly 2 U.S.C. § 441e) by making a foreign national contribution in the amount of \$86,000 to Canseco for Congress (the "Committee"). The Commission authorized the Office of General Counsel to attempt to settle this violation through pre-probable cause conciliation and approved a proposed conciliation agreement. Attached is a revised agreement negotiated with Respondents which would resolve the violation. We recommend that the Commission accept the attached negotiated agreement and close the file as to Jorge Canseco and Inmuebles Caza, S.A. de C.V.

31 32

33 34

35 36

The Commission accepted a conciliation agreement with Respondent Rod Lewis on April 21, 2015. The Office of the General Counsel is in ongoing pre-probable cause conciliation discussions with the Committee and Francisco Canseco.

This agreement sufficiently vindicates the Commission's enforcement interests under the circumstances presented in this matter. Therefore, we recommend that the Commission accept the attached signed conciliation agreement with Respondents Jorge Canseco and Inmuebles Casa, S.A. de C.V., approve the appropriate letter, and close the file as to those Respondents.

MUR 6919 (Jorge Canseco and Inmuebles Caza, S.A. de C.V.) Memorandum to the Commission Page 3 of 3

III. RECOMMENDATIONS

3	
4	
5	

ł

2

1. Accept the attached signed conciliation agreement with Jorge Canseco and Inmuebles Casa, S.A. de C.V.

5

2. Approve the appropriate letter.

7 8

3. Close the file as to Jorge Canseco and Inmuebles Casa, S.A. de C.V.

9 10

11

12 13